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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA,
BILLINGS DIVISION

NEIL DEERING, individually,
and on behalf of himself and all others)
similarly situated,)

Plaintiff,)

v.)

CENTURY TEL, INC., a Louisiana)
corporation, CENTURYTEL)
BROADBAND SERVICES, LLC, a)
Louisiana corporation, and)
CENTURYTEL SERVICE GROUP,)
LLC, a Louisiana corporation,)

Defendants.)

Case No. CV-10-63-BLG-RFC

**UNOPPOSED MOTION FOR
LEAVE TO FILE UNDER SEAL**

UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants CenturyTel, Inc., CenturyTel Broadband Services, LLC, and CenturyTel Service Group, LLC (collectively, “Defendants” or “CenturyTel”), hereby move for leave to file under seal their Motion for Summary Judgment, along with its corresponding Brief and Exhibits. Included in Defendants’ Statement of Undisputed Facts (“SUF”) and Brief are quotes from the declarations and depositions of Plaintiffs’ and Defendants’ proposed expert witnesses, which are attached as Exhibits to the SUF. The proposed experts, in writing their declarations, rely in part upon information subject to a protective order in *Dan Valentine, et al. v. Nebuad, Inc., et al.*, CV-08-5113 (TEH), before the United States District Court for the Northern District of California. Counsel for Plaintiff has been contacted and consents to this motion.

WHEREFORE, for the foregoing reason, Defendants hereby move for leave to file under seal their Motion for Summary Judgment along with its corresponding Brief and Exhibits.

Dated: May 25, 2011

Respectfully submitted,

/s/ Alan L. Joscelyn

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